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Filed Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
4455 12th Street, SW
Washington, DC 20554

Re: *Internet-Based Telecommunications Relay Service Numbering*, WC Docket No.
10-191

Dear Ms. Dortch:

On Tuesday July 10, 2012 Kevin Breault, Vice President of Sales, John Nickey, Senior Director of CLEC Services and the undersigned of Bandwidth.com, Inc. ("Bandwidth") met with William Dever (Chief, Competition Policy Division, WCB), Carol Simpson (Deputy Chief, Competition Policy Division, WCB), Heather Hendrickson (Competition Policy Division, WCB), and Richard Hovey (Competition Policy Division, WCB) via conference call to discuss issues related to enabling ubiquitous local calling capabilities for Telecommunications Relay Service ("TRS") service providers.

Bandwidth.com CLEC, LLC has one of the largest local numbering footprints of any carrier in North America and is uniquely positioned to offer underlying wholesale service capabilities to TRS providers as well as other retail communications service providers. During the meeting, Bandwidth discussed the economic and operational difficulties associated with trying to establish local calling capabilities in all local calling areas across the country. Bandwidth expressed its support for allowing TRS service providers to have reasonable and justifiable exceptions to a requirement to provide a local telephone number to all TRS end-users ubiquitously across the country, including the limited use of toll-free calling. Bandwidth has had a great deal of success combining a robust facilities-based interconnection network with carrier partnerships to meet the needs of its TRS provider customers. However, it is also very familiar with the economic and operational implications of servicing the final ten to fifteen percent of the smallest markets in the country as a competitive carrier. During the call Bandwidth also discussed other issues such as challenges it has experienced with porting telephone numbers on behalf of TRS customers relative to the processes it would typically experience with non-TRS LNP procedures.

In accordance with Section 1.1206(b), this *ex parte* notification is being filed electronically for inclusion in the public record of the above proceeding. Should there be any questions or concerns regarding this filing, please direct them to the undersigned.

Sincerely,

/S/
Greg Rogers

cc: Mr. Richard Hovey
Ms. Carol Simpson
Mr. William Dever
Ms. Heather Hendrickson